

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CHRISTINE CHEN, MICHAEL NGUYEN,
and all other similarly situated employees of
SS&C,

Plaintiffs,

v.

SS&C TECHNOLOGIES, INC.,

Defendant.

Case No. 22-cv-02190(JPC)(SLC)

**PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF THE
SETTLEMENT STIPULATION, CERTIFICATION OF THE CLASS FOR
SETTLEMENT PURPOSES, APPROVAL OF THE PROPOSED NOTICE TO CLASS
MEMBERS AND DISTRIBUTION OF SAME, AND IMPLEMENTATION OF THE
SCHEDULE AND PROCEDURE TO EFFECTUATE THE CLASS ACTION
SETTLEMENT**

PLEASE TAKE NOTICE that upon the annexed Declaration of Kara Miller, sworn to on May 30, 2024 and all exhibits attached thereto, the memorandum of law in support, and upon all prior pleadings and proceedings herein, the undersigned will respectfully move this Court, before the Honorable John P. Cronan, United States District Judge for the Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 12D, New York, New York 10007, for Plaintiffs' Motion for an Order granting (1) preliminary approval of the Settlement Stipulation (the "Settlement"), (2) certifying the Settlement class, for settlement purposes only, pursuant to Fed. R. Civ. P. 23, (3) approving the notice and distribution of same to class members, (4) implementing the schedule and procedure proposed by the parties for effectuating the other terms of the Settlement and (5) such other and further relief as the Court may deem just and proper.

Dated: New York, New York
May 30, 2024

VIRGINIA & AMBINDER LLP

By: /s/Kara Miller

Kara Miller, Esq.
Jenny Brejt, Esq.
40 Broad Street – 7th Floor
New York, New York 10006
Tel: 212.943.9081
kmiller@vandallp.com

*Attorneys for Named Plaintiffs and the Putative
Class*

TO: All counsel via ECF